



**Code of Ethics**

The companies Flídr metal s.r.o. and Flídr plast s.r.o. accept this Code of Ethics as a set of basic values and approaches to the business by which they are guided during the performance of their business activities. The company's code of ethics is not a generally binding legal regulation, but it is a set of rules supplementing statutory and other legal regulations.

The compliance with the Ethics Code by the company, is its moral obligation regulating the behavior and actions of all employees towards the company, colleagues, customers and other business partners, state administration and the public.

The company's Ethics Code includes a draft of the law to protect whistleblowers, which was discussed in the Czech Republic following the adoption of Directive 2019/1937 of the European Parliament and of the EU Council of 23 October 2019 to protect persons who report breaking of the Union law and provides protection to whistleblowers and their loved ones from the side of their employer.

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| <b>PROTECTION OF THE COMPANY NAME REPUTATION</b> | Employees are always obliged, even in their non-working activities, to act and behave with the knowledge, that they still represent the company and that their actions, behavior or statements can damage or discredit the good name of the employer.   |
| <b>CONDUCT IN COMPLIANCE WITH THE LAW</b>        | The compliance with the Constitution of the Czech Republic, laws, international contracts, regulations in the field of human rights and other legal rules, is the basis of the company ethical standards.   |
| <b>MANAGEMENT</b>                                | Managers are moral and ethical qualities example for the other employees and company representatives and are responsible to monitor the compliance with the Code of Ethics among their subordinates.  |
| <b>RELATIONSHIPS TO THE EMPLOYEES</b>            | <ol style="list-style-type: none"><li>1. The company establishes mutual employee relations on respect for the dignity of each person.</li><li>2. The company creates pleasant and safe working conditions for the work of its employees and enables the improvement of their professional level.</li><li>3. The company employs the employees on the base of their suitability for the certain job without any political, racial, religious or national discrimination, regardless of gender, age or status. It is forbidden to collect and record any information that could contribute to discrimination. At the same time, the company emphasizes the compliance with the working conditions for teenagers and pregnant women.</li><li>4. Child labor and modern slavery (eg. forced labour, servitude and human trafficking) are prohibited in the company.</li><li>5. The company does not allow any form of discrimination based on gender, race, religion, sexual orientation, political beliefs, or nationality.</li><li>6. The company does not allow any form of harassment - sexual, psychological or physical.</li><li>7. The company ensures fair remuneration of its employees for the work performed, including proper payment of wages.</li><li>8. The company guarantees and at the same time requires compliance with the principles of the safe work as well as the compliance with and using of the legally defined working time fund.</li><li>9. The company respects all rights of employees in the area of freedom of association and collective bargaining.</li></ol> |



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| <b>CORRUPTION, CONFLICT OF INTEREST, FAIR COMPETITION, AND ANTI-MONOPOLY MEASURES</b> | <p>The company does not tolerate any manifestations of corruption, extortion or bribery. When working with customers, suppliers and other partners, employees may not accept or demand gifts, payments, or in any other way influence impartial negotiations. Relations with suppliers and customers when choosing goods or services must take place only on the basis of competitive conditions of quality and price and must be socially beneficial. If there is a risk that the employee could be in a conflict of interest while performing his/her work, he/she is obliged to report this to his/her superior. At the same time, it is strictly forbidden to influence fair competition in any way respectively to assist to violate the applicable antitrust measures.</p>  |
| <b>RELATIONS AT THE WORKING PLACE</b>   | <p>Functional working relationships and the atmosphere of cooperation are the basis of the company's successful development.</p> <p>When performing tasks and when dealing with colleagues, the employee must not:</p> <ul style="list-style-type: none"><li>- belittle your colleagues</li><li>- misrepresent or conceal information necessary to complete the task</li><li>- to prioritize own interests or the interests of a third party over the interests of the company</li><li>- to unreasonably refuse the necessary cooperation with the other colleagues during the performance of the working tasks</li></ul> <p>In the event of a labor dispute between employees, the parties to the dispute are obliged to actively, constructively and responsibly seek a solution to such a dispute with regard to the interests of the company and, in the event of failure to reach an agreement, to inform their superiors.</p> |
| <b>SENSITIVE INFORMATION</b>  | <p>All non-public information, the publication or disclosure of which could benefit competitors or harm the company, its suppliers, customers or employees, is considered as sensitive information. These include trade secrets, patents, trademarks, financial data, business plans, proposals, databases, payroll information and personal information of employees. The employees are required to maintain the confidentiality of such sensitive information communicated to them or gained access to in the course of their work for the company. No one may use this information for personal gain.</p>  |
| <b>PROTECTION OF THE PROPERTY</b>   | <p>Employees must take care of the protection of the company's property and its effective use. They must treat property with care and protect it from the loss, theft or misuse. The company property cannot be used for the private activities of employees.</p>   |
| <b>ENVIRONMENT</b>  | <p>In all activities, including planning, production, sales and all handling with the products, the company protects the environment and complies with the applicable legislative regulations and complies with the ISO 14001 standard. Furthermore, the company Flídr metal s.r.o. and Flídr plast s.r.o. they are moving towards to the global trend of ecological thinking, e.g. by reducing the consumption of energy and resources, recycling waste, replacing outdated technologies with new technologies with less impact on the environment and using renewable energy sources.</p>   |
| <b>COMPLIANCE WITH AND VERIFICATION OF THE ETHICS CODE</b>                            | <p>The company will deal with all suggestions regarding the violations of the Code of Ethics and at the same time excludes any penalty or negative influence on the employee who submitted a suggestion in connection with this Code of Ethics.</p>   |
| <b>DELIVERY OF THE INITIATIVES</b>  | <p>All suggestions can be delivered by e-mail or you can contact your superior, the personnel department or the company's management. Information can also be submitted anonymously to "suggestions, comments and proposals" boxes located throughout the company.</p>  |



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### WHISTLEBLOWER PROTECTION LAW

In the area of the whistleblower protection, we promote the following procedures (following the adoption of EU Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of the persons who report violations of Union law, it provides protection to whistleblowers and their loved ones against retaliatory measures by their employer):

- 1. Internal reporting system** – Represents the organization's set of procedures and rules that enable safe reporting and response. The employer will designate the appropriate person for receiving and assessment of the notification.
  - **In writing** – in electronic form to [whistleblowing@flidr.cz](mailto:whistleblowing@flidr.cz) or in paper form in the mailboxes at the attendance recording terminal. (in a sealed closed envelope addressed to the relevant persons)
  - **Orally** – in person or by phone to the relevant persons. For Flídr metal s.r.o. and Flídr plast s.r.o. the manager of the personnel department and his/her official representative in case of absence at the workplace, are appointed as the relevant persons.
- 2. The protection applies** to notifications containing information about illegal behavior with features of a crime or misdemeanor, but also to violations of the regulations in areas defined by law (financial, security, health protection and environment).
- 3. The protection does not apply** to private law or disciplinary offenses or reports of a trivial or bullying nature.
- 4. Protection applies to whistleblowers** - employees, self-employed persons who suspect that at the workplace or in the course of the performance of work, an illegal act was committed by another person. A person close to the whistleblower is also protected from retaliatory measures.
- 5. Retaliatory measures are strictly excluded** - dismissal, non-promotion or transfer to a lower position, salary reduction, change of working hours, negative evaluation, non-renewal of contract and others.
- 6. Confidentiality** – submitting a notification is not considered as a breach of contractual confidentiality, bank secrecy or confidentiality under the tax code or other regulations
- 7. Truthfulness of report** - the person who knowingly makes a false report, may be guilty of an offence.
- 8. The relevant person is obliged** to notify the notifier in writing of the receipt of the notification within 7 days from the date of its receipt, unless
  - the notifier explicitly asked the relevant person not to inform him about the receipt of the notification.
  - it is obvious that the notification of receipt of the notification would reveal the identity of the notifier.

### USAGE OF THE MINERAL RESOURCES FROM CONFLICT AND RISK AREAS

The company Flídr metal s.r.o. and Flídr plast s.r.o. they take care not to use materials produced by smelting minerals from conflict sources. Minerals are considered to be from conflict sources if their extraction, transport, trade, handling/processing or export directly or indirectly supports non-state armed groups. For this purpose, the company uses the standard report template (Conflict Minerals Reporting Template), issued by the Conflict-Free Sourcing Initiative (CFSI).

V Širokém Dole, dne 18.10.2023

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Ing. Karel Flídr, CEO